

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 3:23-CV-395
)	
v.)	
)	
ALL CRYPTOCURRENCY, VIRTUAL)	
CURRENCY, FUNDS, MONIES, AND OTHER)	
THINGS OF VALUE SEIZED, PURSUANT TO)	
A SEIZURE WARRANT, FROM BINANCE)	
AND ASSOCIATED WITH USER ID #)	VERIFIED CLAIM
17392912, SUCH USER ID ASSOCIATED)	FOR SEIZED PROPERTY
WITH THE NAME, VIPIN KUMAR, AND)	
TETHER DEPOSIT ADDRESS,)	
TCJvnhLCvCwqEzcYiZKbr9F4pkkiLPGzyv; and)	
)	
ALL CRYPTOCURRENCY, VIRTUAL)	
CURRENCY, FUNDS, MONIES, AND OTHER)	
THINGS OF VALUE SEIZED, PURSUANT TO)	
A SEIZURE WARRANT, FROM BINANCE)	
AND ASSOCIATED WITH USER ID #)	
159588534, SUCH USER ID ASSOCIATED)	
WITH THE NAME, RAHUL AGARWAL AND)	
TRON (TRX) DEPOSIT ADDRESS)	
TEp28dMpzcMo4X1rWb36Gj9HbWd1mqEtXS.)	

VERIFIED CLAIM

Pursuant to Rule G(5) of Title XIII, Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, I, Vipin Kumar, hereby claim and demand the return and/or release of the following seized items in the instant case:

1. All assets seized related to "TARGET ACCOUNT A" as defined in Paragraph 2(a) in the Complaint for Forfeiture *in Rem* (Dkt. 1).
2. My interest in the property is that I am the lawful owner of the Binance account associated with USER ID # 17392912, and I lawfully held the property that was seized from the account. The assets seized are my property because they were

accumulated through cryptocurrency investments, particularly through peer-to-peer transactions that I engaged in.

3. I do not claim ownership of the assets seized related to "TARGET ACCOUNT B" as defined in Paragraph 2(b) in the Complaint for Forfeiture *in Rem*.

I hereby verify that the averments contained in the foregoing Claim are true and correct to the best of my knowledge, information and belief.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date: December 8, 2023



Vipin Kumar

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Verified Claim was served on December 8, 2023 via the Court's electronic filing system upon all counsel of record.

/s/ Bryan G. Scott